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THE UNITED STATES DISTRICT COURT
Middle District of Pennsylvania
Harrisburg, PA

Yan SHAO

No. 1:00 CV 1901
(JUDGE Rambo)

Plaintiff,

v.

Edward Cuccia
Charles Day
John / Jane Doe
Law Offices of Ferro & Cuccia

CIVIL ACTION - LAW

Defendants.

FILED
HARRISBURG, PA

SEP 25 2002

MARY E. D'ANDREA, CLERK
Per all
Deputy Clerk

PLAINTIFFS' FIRST SET OF INTERROGATORIES IN AID OF
EXECUTION OF JUDGEMENT TO THE DEFENDANT CHARLES DAY

To:

CHARLES DAY
325 Broadway, Suite 505
New York, NY 10007
212 964 4767

Pursuant to Rule 69 and Rule 34 of the Federal Rules of Civil Procedure, the plaintiff requests the defendant answer the following interrogatories within 30 days of service of this pleading, by mailing a copy of the same to the undersigned at the address indicated below. Enclosed are two (2) copies of the Interrogatories and a stamped, self-addressed envelope for the return of responses to the Interrogatories.

If you do not answer the attached questions within the time required, the opposing party may ask the Court to conduct a hearing in order to determine if you should be held in contempt. You will be compelled to appear at the hearing and explain your reasons for your failure to answer.

You must answer each question giving complete answers, attaching additional pages if necessary. False or misleading answers may subject you to punishment by the

Court. Even if you dispute the judgment you must answer all of the attached questions.

Be sure to sign and date your answers.

Date: _____

Respectfully Submitted,

Richard B. Cook (LA 21248. MD)
Attorney for the Plaintiff
PO Box 411
Hunt Valley, MD 21030-0411
410/683-9469

INTERROGATORIES IN AID OF EXECUTION OF JUDGEMENT

1. Full name: _____
2. Address: _____
3. Birth Date: _____
4. Social Security Number: _____
5. Drivers' License Number and Expiration Date: _____
6. Telephone Number: _____
7. Full Name and Address of Your Employer:

a. Your weekly salary: Gross _____ Net _____
b. If not presently employed, name and address of last employer

8. If there is currently a wage execution on your salary (circle one):
Yes No
9. List the names, addresses and account numbers of all bank accounts on which your name appears:

- a. _____
- b. _____
- c. _____

10. If you receive money from any of the following sources, list the amount, how often and the name and address of the source, using additional paper, if necessary;
Type

	<u>Amount & Frequency</u>	<u>Name & Address of Source</u>
Alimony	_____	_____
Loan Payments	_____	_____
Rental Income	_____	_____
Pensions	_____	_____
Bank Accounts	_____	_____
Stock Dividends	_____	_____

11. Do you receive social security benefits? (circle one)

Yes
No

12. Do you own property where you reside? (circle one)

Yes
No

If yes, state the following:

- a. Name of the owner or owners: _____
- b. Date property was purchased: _____
- c. Purchase price: _____
- d. Name and address of mortgage holder: _____
- e. Balance due on mortgage: _____

13. Do you own any other real estate? (circle one)

Yes

No

If yes, state the following for each property:

- a. Address of property: _____
- b. Date property was purchased: _____
- c. Purchase price: _____
- d. Name and address of all owners:

e. Name and address of mortgage holder: _____

f. Balance due on mortgage: _____

g. Name and address of all tenants and monthly rental paid by each tenant:

1. _____

2. _____

3. _____

14. Does the present value of your personal property which include automobiles, furniture, appliances, stocks, bonds, and cash on hand exceed \$1,000.00? (circle one)

Yes

No

and itemize all personal property owned by you (use additional paper, if necessary).

Cash on Hand: \$ _____

Other Personal Property (excluding Motor vehicles)

Set forth make _____, model _____ & serial number _____.

If financing, the name and address of party to whom payments are made).

Item: _____

Date Purchased: _____

Purchase Price: _____

Is Finance Balance Still Due? _____

Present Value: _____

Set forth make _____, model _____ & serial number _____.

If financing, the name and address of party to whom payments are made).

Item: _____

Date Purchased: _____

Purchase Price: _____

Is Finance Balance Still Due? _____

Present Value: _____

Set forth make _____, model _____ & serial number _____.

If financing, the name and address of party to whom payments are made).

Item: _____

Date Purchased: _____

Purchase Price: _____

Is Finance Balance Still Due? _____

Present Value: _____

Set forth make _____, model _____ & serial number _____.

If financing, the name and address of party to whom payments are made).

Item: _____

Date Purchased: _____

Purchase Price: _____

Is Finance Balance Still Due? _____

Present Value: _____

Set forth make _____, model _____ & serial number _____.

If financing, the name and address of party to whom payments are made).

Item: _____

Date Purchased: _____

Purchase Price: _____

Is Finance Balance Still Due? _____

Present Value: _____

15. Do you own one or more motor vehicles? (circle one)

Yes

No

If yes, state the following for each vehicle owned:

a. Make, model and year of motor vehicle: _____

b. If there is a lien on the motor vehicle, state the name and address of the lien holder, and the amount due to the lien holder:

c. State where Licensed and License plate: _____

d. Vehicle identification number: _____

Set forth make _____, model _____ & serial number _____.

If financing, the name and address of party to whom payments are made).

Item: _____

Date Purchased: _____

Purchase Price: _____

Is Finance Balance Still Due? _____

Present Value: _____

Set forth make _____, model _____ & serial number _____.

If financing, the name and address of party to whom payments are made).

Item: _____

Date Purchased: _____

Purchase Price: _____

Is Finance Balance Still Due? _____

Present Value: _____

16. Do you own a business? (circle one)

Yes

No

If yes, state the following:

a. Name and address of the business:

b. Is the business a Corporation, sole proprietorship, or partnership? _____

c. The name and address of all stockholders, officers, and/or partners (use separate paper, if necessary):

d. The amount of income received by you from the business during the last twelve months: \$ _____

17. Set forth all other judgments that you are aware of that have been entered against you and include partners (use separate paper, if necessary):

Creditor's Name	Creditor's Attorney	Amount Due	Name of Court	Docket
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

CERTIFICATE OF SERVICE

I certify that copies of the foregoing interrogatories have been served upon the pro se defendant by first class mail this _____ day of _____, 2002.

Richard B. Cook

RICHARD B COOK ESQ
PO Box 411
Hunt Valley MD 21030

**RETURN RECEIPT
REQUESTED**

CERTIFIED MAIL



7000 0600 0027 9113 3175

U.S. POSTAGE
PAID
COCKEYSVILLE, MD
21030
JUL 23, 02
AMOUNT
\$5.34
00056101-02
11432
0008
UNITED STATES
POSTAL SERVICE

Richard B. Cook, Esq
PO Box 411
Hunt Valley, MD 21030

UNCLAIMED

CHARLES DAY
80-100 Tryon Place
Jamaica, NY 11432

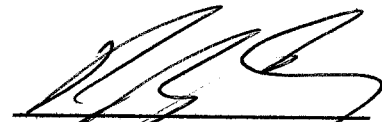
64
Name
1st Name 7/27
2nd Name
Amount \$12
Final Notice

LR 7.1 CERTIFICATE OF NONCONCURRENCE

Undersigned counsel for the plaintiff certifies that the preceding motion has been served upon the defendant but that no concurrence to its filing has been obtained. The undersigned recently has discovered a telephone number for Mr. Day in New York City (212 274 8408) and called on Sept. 23, 2002 but was informed that Mr. Day is in Immigration Court in New Jersey both in the A.M. and in the P.M. as well.

Respectfully submitted,

Craig T. Trebilcock
Pa I.D. No. 48344
Associate Counsel for the Plaintiff
100 East Market
PO Box 15012
York, PA 17405-7012
717 846-8888



Richard B. Cook
Louisiana #21248
Counsel for the Plaintiff
17 Jonathan's Court
PO Box 411
Hunt Valley, MD
410 683 9469

CERTIFICATE OF SERVICE

Undersigned counsel certifies that on Sept. 23, 2002, a copy of the appended motion, order, and certificate of non-concurrence have been served on the defendant by First Class Mail, postage pre-paid, to the following addresses:

Address provided by the New York State Court Administrator:

Charles Day, Esq.
80-100 Tryon Place
Jamaica, NY 11432

Address recently discovered by counsel for the plaintiff, via internet search:

Charles Day, Esq.
30 E. Broadway
New York, NY 10002


Richard B. Cook